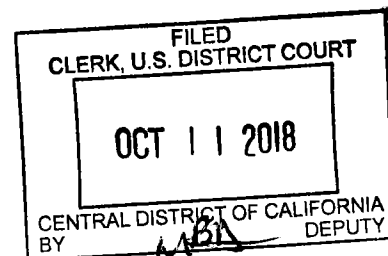


CARL JAMAL CHRISTIAN # BE-9036  
 Name and Prisoner/Booking Number  
CSP. CONCOMAN ASU # 175  
 Place of Confinement  
P.O. Box 3456  
 Mailing Address  
CONCOMAN, CA 93212  
 City, State, Zip Code



(Failure to notify the Court of your change of address may result in dismissal of this action.)

IN THE UNITED STATES DISTRICT COURT  
 FOR THE ~~CENTRAL~~ DISTRICT OF CALIFORNIA  
 CENTRAL

CARL JAMAL CHRISTIAN  
 (Full Name of Plaintiff) Plaintiff,

v.

CASE NO. 2:18-CV-05792-CJC-(JDE)  
 (To be supplied by the Clerk)

(1) COUNTY OF LOS ANGELES et. Al  
 (Full Name of Defendant)

(2) Sgt. OROZCO, Sgt. DELGADO, Sgt. STRANGE

(3) LT. REVELES, LT. WEBER, CAPT. STRANGE

(4) DGP. M. VALDIVIA, DGP. SCHAEFER  
 Defendant(s).

☒ Check if there are additional Defendants and attach page 1-A listing them.

(5) DGP. GHOSH, DGP. CARMONA, DGP. LEYVA  
 (6) CHIEF FENDLER.

CIVIL RIGHTS COMPLAINT  
 BY A PRISONER

- ☐ Original Complaint  
☐ First Amended Complaint  
☒ Second Amended Complaint

"JURY TRIAL DEMANDED"

A. JURISDICTION

1. This Court has jurisdiction over this action pursuant to:

- ☒ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983  
☐ 28 U.S.C. § 1331; Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971).  
☐ Other: \_\_\_\_\_

2. Institution/city where violation occurred: TWIN TOWNS CORRECTIONAL FACILITY

**B. DEFENDANTS**

1. Name of first Defendant: COUNTY OF LOS ANGELES. The first Defendant is employed as:  
 \_\_\_\_\_ at \_\_\_\_\_  
 (Position and Title) (Institution)
2. Name of second Defendant: SGT. SAMUEL OROZIO. The second Defendant is employed as:  
SGT at TTLF  
 (Position and Title) (Institution)
3. Name of third Defendant: DELEON. The third Defendant is employed as:  
SGT at TTLF  
 (Position and Title) (Institution)
4. Name of fourth Defendant: SANDOVAL. The fourth Defendant is employed as:  
SGT at TTLF  
 (Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

**C. PREVIOUS LAWSUITS**

1. Have you filed any other lawsuits while you were a prisoner? ☐ Yes ☒ No
2. If yes, how many lawsuits have you filed? \_\_\_\_\_. Describe the previous lawsuits:
  - a. First prior lawsuit:
    1. Parties: \_\_\_\_\_ v. \_\_\_\_\_
    2. Court and case number: \_\_\_\_\_
    3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
  - b. Second prior lawsuit:
    1. Parties: \_\_\_\_\_ v. \_\_\_\_\_
    2. Court and case number: \_\_\_\_\_
    3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
  - c. Third prior lawsuit:
    1. Parties: \_\_\_\_\_ v. \_\_\_\_\_
    2. Court and case number: \_\_\_\_\_
    3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

## D. CAUSE OF ACTION

## CLAIM I

1. State the constitutional or other federal civil right that was violated: AMENDMENT VIII (8) OF THE CONSTITUTION "NO CRUEL AND UNUSUAL PUNISHMENTS INFLICTED"  
V<sup>TH</sup> (5)<sup>TH</sup> AMENDMENT, 14<sup>TH</sup> AMENDMENT VIOLATIONS SINCE I WAS A PRETRIAL DETENEE
2. Claim I. Identify the issue involved. Check only one. State additional issues in separate claims.
- |  |   |   |                                       |
|--|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities                         | <input type="checkbox"/> Mail             | <input type="checkbox"/> Access to the court  | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings                  | <input type="checkbox"/> Property         | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation  |
| <input checked="" type="checkbox"/> Excessive force by an officers | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____         |                                       |
3. Supporting Facts. State as briefly as possible the FACTS supporting Claim I. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- IN AUGUST 2016 SGT. SAMUEL OROZLO, DEPUTIES JONES, BATEMAN, LOPEZ, + PEREZ  
ALL USED EXCESSIVE FORCE ON ME WHILE EXTRACTING ME FROM TEEF MODULE 142 CELL #F-2.
1. BATEMAN SHOT ME WITH OVER 50-65 PEPPER BALLS, OROZLO SPRAYED ME WITH 1 CAN OF SPRAY, JONES SPRAYED ME WITH 1 CAN OF SPRAY, LOPEZ SPRAYED ME WITH 1 CAN OF SPRAY, PEREZ SPRAYED ME WITH 1 CAN OF SPRAY. ~~AND~~ ALL OF THIS WAS RECORDED BY DVTEL CAMERA SYSTEM WITHIN LA COUNTY JAIL AND SHOULD BE IN POSSESSION OF EVIDENCE. -  
THIS WAS DONE MALICIOUSLY / SADISTICALLY. FORCE USED WAS OBVIOUSLY UNREASONABLE.  
I WAS STRANGLER BY DEPUTY SCHAEFER IN THE BACK OF AN AMBULANCE IN 2016. I
2. GOT STRANGLER WHILE I WAS IN MECHANICAL RESTRAINTS (WAIST CHAIN + ANKLE RESTRAINTS).  
ALSO PRESENT WERE SGT. DELEON, DEPUTY CHAVEZ, + DEPUTY CENTENO. NOBODY STOPPED SCHAEFER FROM STRANGLING ME. I LOST CONSCIOUSNESS. NOBODY HELPED ME.
3. WHILE I WAS IN MODULE 211 D7 I WAS BEAT UP IN A CELL BY DEPUTIES CARMONA +  
DEPUTY GHOSH. I WAS PUNCHED IN MY HEAD AND SLAMMED DOWN ON A METAL BUNK.  
WHEN I ATTEMPTED TO DEFEND MYSELF DEPUTY LEYVA SPRAYED ME WITH A WHOLE CAN OF SPRAY. SGT. DELEON WAS PRESENT AND ENCOURAGED / INSTIGATED THIS ATTACK.  
I WAS NOT ALLOWED TO DECONTAMINATE AND HAD TO USE TOILET WATER TO DECONTAMINATE
4. Injury. State how you were injured by the actions or inactions of the Defendant(s).
- I WAS INJURED WITH BODY TRAUMA, HEADACHES / MIGRAINES, BACK, NECK, SHOULDER ~~AND~~ PAIN.  
DIFFICULTY SLEEPING. DIFFICULTY BREATHING. ~~DEFENDANT'S~~ PSYCHOLOGICAL TRAUMA
5. Administrative Remedies:
- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
  - Did you submit a request for administrative relief on Claim I? ☒ Yes ☐ No
  - Did you appeal your request for relief on Claim I to the highest level? ☒ Yes ☐ No
  - If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. PLEASE NOTE THAT ALTHOUGH GRIEVANCES WERE FILED DEFENDANTS FAILURE TO RESPOND CONSTITUTES EXHAUSTION.

## CLAIM II

1. State the constitutional or other federal civil right that was violated: VIII<sup>TH</sup> AMENDMENT - CRUEL AND UNUSUAL PUNISHMENT

2. Claim II. Identify the issue involved. Check **only one**. State additional issues in separate claims.

- ☐ Basic necessities      ☐ Mail      ☐ Access to the court      ☐ Medical care  
☐ Disciplinary proceedings      ☐ Property      ☐ Exercise of religion      ☐ Retaliation  
☐ Excessive force by an officer      ☐ Threat to safety      ☒ Other: DELIBERATE INDIFFERENCE.

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim II. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

LT. REVELS WAS DELIBERATELY INDIFFERENT TO MY NEEDS BY ~~FORCING ME TO~~ FORCING ME TO  
SLEEP NAKED FOR DAYS WITHOUT BLANKETS, MATTRESS, CLOTHING. THIS OCCURRED IN ROOM 211.  
A SIGN WAS PASTED AND PLACED ON MY DOOR. FARMER V. BRENNAN  
LT. REVELS ALSO DID NOT RESPOND TO MY GRIEVANCE NOR DID HE SUPPLY ME WITH  
THE CONCLUSIONS OF THE NUMEROUS GRIEVANCES THAT I FILED.  
SGT. DELLOU WAS DELIBERATELY INDIFFERENT TO ME WHEN DEPUTY SCHAFER WAS  
STRANGLING ME IN THE BACK OF THE AMBULANCE. BURGESS V. MOORE 39 F.3d 216,  
218 (8TH CIR. 1994) (ASSISTANT SUPERINTENDENT AT PRISON COULD BE FOUND DELIBERATELY  
INDIFFERENT FOR FAILING TO INTERVENE WHEN GUARDS HELD INMATE DOWN AND BEGAN CHOKING HIM)  
I WAS CHOKED TO THE POINT OF UNCONSCIOUSNESS.  
CAPTAIN STRANGE, CHIEF FINDER WERE DELIBERATELY INDIFFERENT TO  
MULTIPLE USES OF FORCE AS WELL AS NEVER ANSWERED ANY GRIEVANCES.  
FARMER V. BRENNAN 511 U.S. 825, 114 S.Ct. 1141 (1999) (WHEN I REPORTED TO  
LT. WEBER WHAT M. VALDOVINO DID TO ME AT THE PRISON OF  
SGT. SANDOVAL HE (WEBER) TURNED A BLIND EYE TO THE ABUSE  
OFFICE OF INSPECTOR GENERAL INVESTIGATION MS. BARBARA PERHAPS AS  
AWARE OF THESE RESULTS.

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

FREEZING TEMPERATURES IN 211 D7, WAS STRANGLING TO POINT OF UNCONSCIOUSNESS - PSYCHOLOGICAL TRAUMA.

5. Administrative Remedies.

- a. Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No  
 b. Did you submit a request for administrative relief on Claim II? ☒ Yes ☐ No  
 c. Did you appeal your request for relief on Claim II to the highest level? ☒ Yes ☐ No  
 d. If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. ADMINISTRATIVE REMEDIES EXHAUSTED WITH DEFENDANT'S  
FAILURE TO RESPOND TO GRIEVANCES.

## CLAIM III

1. State the constitutional or other federal civil right that was violated: 8th (8) Amendment  
CRUEL AND UNUSUAL PUNISHMENT.
2. **Claim III.** Identify the issue involved. Check **only one**. State additional issues in separate claims.
- |   |   |   |                                       |
|---|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities                        | <input type="checkbox"/> Mail             | <input type="checkbox"/> Access to the court  | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings                 | <input type="checkbox"/> Property         | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation  |
| <input checked="" type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____         |                                       |
3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim III. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- DEPUTY M. VALDONOVOS STRANDED ME WHILE I WAS IN A GUNNY CHAIR.  
I WAS STRANDED WITH SCAT BAIT STAIRS. DUE TO ME BEING SGT VEDRO  
ESCORT AFTER THE AUGUST 2016 INCIDENT THIS WAS PERFORMED BY  
AND WITNESSED BY SGT. SANDOVAL. I WAS STRANDED BECAUSE I  
CLEARED MY THROAT AND HE (VALDONOVOS) THOUGHT I WAS GOING  
TO SPAT ON HIM.
4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).
- NECK SORENESS, SHORTNESS OF BREATH, INNER NECK PAIN.  
PSYCHOLOGICAL TRAUMA.
5. **Administrative Remedies.**
- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
  - Did you submit a request for administrative relief on Claim III? ☐ Yes ☐ No
  - Did you appeal your request for relief on Claim III to the highest level? ☒ Yes ☐ No
  - If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. FILED GRIEVANCE BUT DUE TO ADMINISTRATIVE NOT  
RESPONDING EXHAUSTION IS MET.

If you assert more than three Claims, answer the questions listed above for each additional Claim on a separate page.

E. REQUEST FOR RELIEF

State the relief you are seeking:

WHEREFORE, PLAINTIFF RESPECTFULLY PRAYS THAT THIS COURT:  
A. DECLARE THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFFS RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES.  
B. ORDER DEFENDANTS TO PAY COMPENSATORY AND PUNITIVE DAMAGES IN THE AMOUNT OF \$9,000,000.00 U.S. DOLLARS. NINE MILLION U.S. DOLLARS  
C. ORDER DEFENDANTS TO PAY REASONABLE ATTORNEY FEES AND COSTS; AND  
D. GRANT OTHER JUST AND EQUITABLE RELIEF THAT THIS HONORABLE COURT DEEMS NECESSARY.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/8/2018  
DATE

[Signature]  
SIGNATURE OF PLAINTIFF  
PRO SE

\_\_\_\_\_  
(Name and title of paralegal, legal assistant, or other person who helped prepare this complaint)

\_\_\_\_\_  
(Signature of attorney, if any)

\_\_\_\_\_  
(Attorney's address & telephone number)

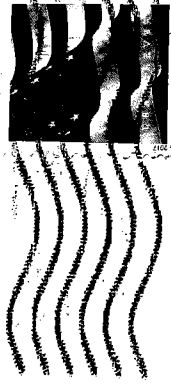
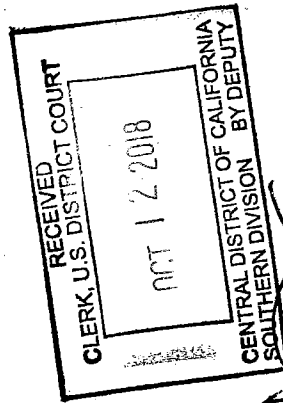
ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space you may attach more pages, but you are strongly encouraged to limit your complaint to twenty-five pages. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages. Remember, there is no need to attach exhibits to your complaint.

CARL JAMAL CHARLSTON # BE-9036  
CSP CONCORD, ASU # 175  
PO Box 3456  
CONCORD, CA 93212

"L66AL MAIL" SANTA CLARITA CA 913

09 OCT 2018 PM 5 L



MAILED 10/8/18

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
255 EAST TEMPLE STREET Floor 180  
LOS ANGELES, CA 90012

"L66AL MAIL"

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50012-333299

2 of 2

